

TRULINCS 10579062 - STILLEY, OSCAR AMOS - Unit: YAZ-B-B

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FROM: 10579062

TO:

SUBJECT: 2255\_ReynoldsR11Mtn

DATE: 05/12/2019 08:18:38 AM

\* UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

AARON KEITH REYNOLDS 09093-002

DEFENDANT/PETITIONER

V. CIVIL 2:17-CV-651 AKK/CS

CRIMINAL 2:14-CR-432-09 AKK/WC (Without prejudice to the fact that Sharon Lovelace Blackburn  
was trial judge)

UNITED STATES

PLAINTIFF/RESPONDENT

PETITIONER'S MOTION FOR RULE 11 SANCTIONS AGAINST PLAINTIFF/RESPONDENT AND/OR COUNSEL

Comes now Petitioner Aaron Keith Reynolds (Petitioner) and for his motion states:

1. Petitioner filed an amended verified petition under 28 USC 2255.
2. Said amended petition included numerous statements of fact, most of which were listed in paragraph numbers below the claim with which the factual allegation was associated.
3. The court ordered response to the amended petition made what amounts to a "general denial," saying on page 10 that "Any facts not specifically admitted in this response are denied."
4. This denial was signed by Brandon W. Bates, Assistant United States Attorney, under the name Louis V. Franklin, Sr., United States Attorney.
5. Petitioner stated that he offered to donate certain property to the DOJ-FBOP, for the use of inmates, for legal and educational purposes. A copy of this offer was attached.
6. Mr. Bates by his general denial has denied a fact that cannot reasonably be denied.
7. In fact, if within the time allowed by FRCivP 11 to correct an offending pleading, the government agrees in writing to allow the referenced donations, within 90 days of the date of signature upon Petitioner's reply, to the DOJ-FBOP for the prompt, full and fair use and benefit of inmates at FCC Yazoo City Low, for educational, legal, and other proper purposes, Petitioner will not file this motion.
8. If in fact the government goes claim by claim, paragraph by paragraph, and makes specific admissions or denials that are reasonably arguable, in compliance with the requirements of Rule 11, Petitioner will not file this motion even if the government rejects Petitioner's offer or maintains silence as to the offer.
9. In fact, most of the Petitioner's claimed supporting facts are such that they cannot be denied, consistent with a licensed attorney's duties under the applicable rules of professional conduct, and FRCivP 11.
10. Petitioner reserves the right to file a supporting brief, if the government neglects and fails to remediate its violations of Rule 11. Whether or not an additional brief is filed, Petitioner relies on the arguments made in his reply to the government's response to Petitioner's amended petition.
11. Petitioner is and remains open to good faith negotiations, to remediate the Rule 11 violations complained of herein. This prison has video conferencing capability, and Petitioner would be pleased to use it to communicate more effectively with counsel for the government.


WHEREFORE, Petitioner requests that the Court sanction Plaintiff/Respondent and/or counsel for Plaintiff/Respondent, by giving the Plaintiff/Respondent a CHOICE between allowing Petitioner to make the donations proffered in the attachment to his amended verified petition, or to suffer such other consequences as the Court deems just, including but not limited to monetary

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sanctions, referral to attorney disciplinary authorities, and a ruling that certain alleged facts are "deemed admitted;" and for such other and further relief as may be appropriate whether or not specifically requested.

)  
)

By:   
Aaron Reynolds  
FCC Yazoo City Low  
PO Box 5000  
Yazoo City, MS 39194

5-6-19  
Date

CERTIFICATE OF SERVICE - PRISON MAILBOX RULE

Petitioner by his signature above pursuant to 28 USC 1746 declares under penalty of perjury that on the date stated above he placed a copy of this pleading in the prison outgoing mail receptacle, with sufficient 1st class postage, to Brandon Bates, AUSA, 131 Clayton Street, Montgomery AL 36104, but did not file it at the same time, pending the expiration of the 21 day safe harbor.

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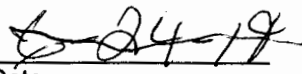
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FROM: 10579062  
TO:  
SUBJECT: FORM\_CertService  
DATE: 05/17/2019 11:45:22 AM

\* CERTIFICATE OF SERVICE - PRISON MAILBOX RULE

By my signature below, pursuant to 28 USC 1746, I declare under penalty of perjury that on the date stated below I served a copy of this pleading on all parties entitled to service by placing a copy of this pleading in the prison outgoing mail receptacle, with sufficient 1st Class US Postage attached, addressed to the clerk for filing and service on all parties entitled to service, via CM/ECF. IN ADDITION, I furthermore placed an additional hard copy of this pleading in the prison outgoing mail receptacle, addressed to Brandon Bates, AUSA, 131 Clayton Street, Montgomery, AL 36104. No other attorney has given notice of entry of appearance or expectation of service, and furthermore both Mr. Bates and any other AUSA counsel of record will necessarily receive a free electronic copy via CM/ECF, immediately upon entry of this pleading into the said system.

By:   
Aaron Keith Reynolds

  
Date  
7-9-19

⇒09093 002⇒

Aaron Key Reynolds  
09093 002 Federal Correction Complex  
Po.Box.5000  
Yazoo CITY, MS 39194  
United States

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JACKSON MS 39201  
10 JUN 2019 PM 2 L



⇒09093-002⇒

Clerk Federal Court House  
1 Church ST  
Montgomery, AL 36104  
United States

36104-401801

